

Exhibit 11

In the Matter Of:

United States vs

Google

JONATHAN BELLACK

November 16, 2023



1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE EASTERN DISTRICT OF VIRGINIA

3 ALEXANDRIA DIVISION

4 CASE NO. 1:23-cv-00108-LMB-JFA

5

6 UNITED STATES OF
7 AMERICA, et al.,

8

Plaintiffs,

9

vs.

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GOOGLE, LLC,

11

Defendant.

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13 - HIGHLY CONFIDENTIAL -

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15 Videotaped deposition of JONATHAN BELLACK,
16 taken pursuant to notice, was held at the offices of
17 Axinn, Veltrop & Harkrider LLP, 114 West 47th Street,
18 New York, New York 10036, taken stenographically before
19 LISA FORLANO, CCR, CRR, RMR and Notary Public, on
20 Thursday, November 16, 2023, commencing at 8:50 a.m.

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353

1 that.

2 You were subject to various
3 litigation holds while you were at Google,
4 correct?

5 MR. BITTON: Objection to form.

6 THE WITNESS: Again, during
7 which time period?

8 BY MS. WOOD:

9 Q At any point from 2008 to 2018?

10 A Yes.

11 MR. BITTON: Objection.

12 BY MS. WOOD:

13 Q And during that time period, did
14 you change your Google chat's default to
15 history on?

16 MR. BITTON: Objection to form.

17 THE WITNESS: No.

18 BY MS. WOOD:

19 Q Are there any folks at Google
20 that you stay in contact with?

21 A Just socially.

22 Q Who?

23 A Jason Bigler, Ari Paparo, Brad
24 Bender, Chris LaSala.

25 Q Anyone else?